

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G, H,  
MARY DOE and MARY ROE, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

GRETCHEN WHITMER, Governor of the  
State of Michigan, and COL. JOSEPH  
GASPER, Director of the Michigan State  
Police, in their official capacities,

Defendants.

No. 2:22-cv-10209

Hon. Mark A. Goldsmith  
Mag. Curtis Ivy, Jr.

**STIPULATED PROTECTIVE ORDER**

In order to protect the interests of Plaintiffs in this action and as stipulated to by the parties, IT IS ORDERED:

1. In all publicly-filed documents, Plaintiffs shall be identified only by their pseudonyms. All documents filed with the Court which contain the names of Plaintiffs or information which identifies Plaintiffs, their family members, or their employers, directly or indirectly, shall have such identifying information redacted.
2. Plaintiffs' counsel shall disclose the names of Plaintiffs to counsel for Defendants promptly upon request.

3. Counsel for Defendants may disclose the identities of Plaintiffs, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs, to named Defendants, employees of Defendants, and experts retained in this case, but only to the minimum extent necessary to litigate this action or to enforce orders issued by this Court.

4. Individuals to whom Defendants disclose Plaintiffs' identities, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs shall not further disclose that information to any other person without first obtaining confirmation from Defendants' counsel that such disclosure is necessary to litigate this action or to enforce orders of this Court.

5. Any person to whom Defendants disclose Plaintiffs' identities, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs as a result of this litigation shall first read this protective order prior to having access to the identities of Plaintiffs. Counsel for Defendants shall ensure that all persons to whom disclosure is made pursuant to paragraphs 3 and 4 are aware that they are bound by this protective order, and may not disclose the Plaintiffs' identities, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs except as specified herein.

6. Under no circumstances shall any person disclose the names of Plaintiffs, Plaintiffs' family members, or Plaintiffs' employers to the media without the consent of counsel for Plaintiffs.

7. If any specific issues related to non-disclosure of Plaintiffs' identities arise during the course of litigation, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

8. This order does not authorize the filing of any documents or other matter under seal. Documents or other matter may be sealed only if authorized by statute, rule, or order of the Court. A party seeking to file such items under seal shall file and serve a motion or submit a proposed stipulated order that sets forth

- a. the authority for sealing;
- b. an identification and description of each item proposed for sealing;
- c. the reason that sealing each item is necessary
- d. the reason that means other than sealing are not available or unsatisfactory to preserve the interest advanced by the movant in support of sealing;
- e. a memorandum of legal authority supporting sealing.

**SO ORDERED.**

Dated: May 26, 2022  
Detroit, Michigan

s/Mark A. Goldsmith  
MARK A. GOLDSMITH  
United States District Judge

Approved by:

s/ Miriam Aukerman (P63165)  
Miriam J. Aukerman  
Rohit Rajan (AZ 035023)  
Attorneys for Plaintiffs  
American Civil Liberties Union  
Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506  
(616) 301-0930  
maukerman@aclumich.org  
rrajan@aclumich.org

s/ Daniel S. Korobkin (P72842)  
American Civil Liberties Union  
Fund of Michigan  
Attorney for Plaintiffs  
2966 Woodward Avenue  
Detroit, MI 48201  
(313) 578-6824  
dkorobkin@aclumich.org

s/ Paul D. Reingold (P27594)  
Cooperating Counsel, American Civil  
Liberties Union Fund of Michigan  
Attorney for Plaintiffs  
Univ. of Michigan Law School  
802 Legal Research Building  
801 Monroe Street  
Ann Arbor, MI 48109-1215  
(734) 355-0319 - pdr@umich.edu

s/ Roshna Bala Keen (Ill. 6284469)  
Loevy & Loevy  
Attorney for Plaintiffs  
Cooperating Counsel, American Civil  
Liberties Union Fund of Michigan  
311 North Aberdeen, 3rd Floor  
Chicago, Illinois 60607  
(312) 243-5900 - roshna@loevy.com

/s/ Eric M. Jamison (P75721)  
Assistant Attorney General  
Attorney for Defendants  
Michigan Dep't of Attorney General  
State Operations Division  
P.O. Box 30754  
Lansing, MI 48909  
(517) 335-7573  
jamisone@michigan.gov